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Newark ■ Philadelphia

January 27, 2021

VIA ECF

Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building and United States Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Bouie v. City of Paterson et al*
Civil Action No.: 17-4109 (SDW) (SCM)

Dear Judge Wettre:

This office represents the Defendant, City of Paterson ("City") in the above-referenced matter. This correspondence is being written in advance of the status conference scheduled with Your Honor on February 2, 2021 and is being filed on behalf all parties. The City has made considerable headway since our last conference in determining the role of the City's excess insurance carrier in resolving this matter. However, there are certain issues that the City is in the process of clarifying. Those issues are important, and their resolution will likely dictate whether settlement negotiations can develop to the point where meaningful offers can or cannot be made in this case.

Plaintiff's counsel and the undersigned have conferred on these issues and believe that the parties are in a position where a settlement conference can help the parties possibly resolve this case. Plaintiff's counsel has indicated that he believes having his client attend a settlement conference would be beneficial. Plaintiff is currently incarcerated at Essex County Correctional Facility on a parole violation. Plaintiff's counsel has conferred with the facility and they have indicated that they can make Plaintiff available for a video or audio settlement conference if such is ordered by Your Honor. Likewise, the undersigned believes having the City attend a settlement conference could help. Accordingly, the parties jointly request that Your Honor schedule a settlement conference in this matter and order that all client's attend.

Should Your Honor require any additional submissions, please do not hesitate to contact this office.

Respectfully requested,

/s/ *Jonathan M. Carrillo*

Jonathan M. Carrillo, Esq.

JMC/cd

cc: All counsel of record (Via ECF)